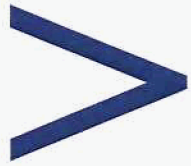




# Intermodal Porting Issues

August 23, 2005



## Agenda

- Review Intermodal Porting Data
- Review NANC's Issue Management Group (IMG) Report on Reducing Intermodal Porting Intervals
- Address Specific LNP Concerns Raised By Various Service Providers

# Background: WLNP Data

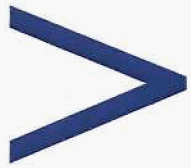
<u>INTERMODAL PORTING DATA</u>			
<u>Timeframe</u>	<u>Total Intermodal Ports</u>	<u>Without Errors</u>	<u>% Of Total</u>
June 05	1536	1527	99.41%
May 05	1642	1625	98.96%
April 05	1492	1489	99.79%
March 05	1651	1645	99.63%
February 05	1472	1459	99.11%
January 05	4191	4164	99.36%
December 04	23580	23521	99.75%
November 04	22362	22325	99.83%
September 04	1926	1867	96.94%
October 04	1998	1951	97.65%
July/August 04	4267	3986	93.41%
May/June 04	3675	3433	93.41%
March/April 04	2472	2236	90.45%
Dec03 / Feb04	2086	1458	69.89%

*The current industry agreed porting interval for wireline service is four (4) days for simple ports. This includes a maximum of one (1) day for the exchange of the Local Service Request (LSR) and the Firm Order Confirmation (FOC) port response between the old service provider and the new service provider, and three (3) days to accomplish the port of the telephone number from the old service provider to the new service provider.*

*Ports in Error occur when carriers port a number, activate the port in the LNP database and a valid LSR has not been submitted ("No LSR") or a carrier sends a LSR, but the old service provider has not sent a FOC ("No FOC") to the carrier submitting the LSR and proceeds with activating the port in the LNP database.*

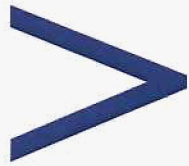
## Background: WLNP Data

- Since the implementation of WLNP, “Ports in Error” have stabilized at less than 1%.
  - Wireless Service Providers have made significant progress in processing intermodal ports and resolving ports in error.
- Data shows that “most porting activity is intra-modal, that is between two landline carriers or between two cellular/PCS carriers.” (*FCC Telephone Numbering Utilization Report, March 2005, p.10*)
- There is no demonstrated need to shorten the intermodal porting interval.



## NANC's Recommendation on Intermodal Porting Intervals

- If the FCC decides to shorten the intermodal porting interval, it should follow the NANC recommendation.
- The NANC recommendation only applies to mechanized, error free “simple ports”. (May 3, 2004 NANC Report & Recommendation on Intermodal Porting Intervals at Section 12- Recommendation)
- “Simple ports” are ports that:
  - Do not involve unbundled network elements.
  - Involve an account for single line.
  - Do not include complex switch transactions (e.g. Centrex, ISDN, AIN services, RCF, multiple services on the loop).
  - Do not include a reseller.

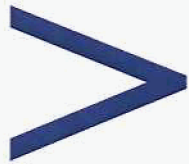


## NANC's Recommendation on Intermodal Porting Intervals

- The NANC Report looked at both the Confirmation interval (LSR-FOC exchange process) and the Activation interval (actual porting process).
- NANC concluded that the best economical alternative for shortening the interval for simple intermodal ports was comprised of the following steps:
  - Old Network Service Provider (ONSP) returns FOC within 5 hours.
  - ONSP sets 10D trigger (*See Note 1*) and sends confirming Subscription Version (SV) at least 24 hours prior to 12:01 AM on the due date. (*See Note 2*)
  - No earlier than 24 hours before the due date, New SP can modify due date at NPAC and activate the port.
- The NANC concluded that this combination offers the shortest "maximum porting interval" (53 hours) and greatest time reduction in hours (43) for the "Low" estimated cost impact.

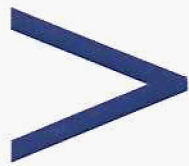
*Note 1:* The 10D trigger is a central office software-switching feature that forces the switch to search the LNP database on every call to determine if the database has been updated with new LNP routing instructions. The setting of the 10D trigger eliminates some of the close coordination needed between the ONSP and New Network Service Provider (NNSP) during the completion of the porting process by eliminating the need for the donor switch disconnect to take place simultaneously with NPAC activation.

*Note 2:* Subscription Version is the term for the NPAC's ported number record. The data includes the telephone number, routing information specific to that ported number and other information related to the record.



## NANC's Recommendation on Intermodal Porting Intervals

- The NANC recommendation **did not** propose that the industry use a common LSOG (Local Service Ordering Guideline).
- The FCC should decline to require the use of a common LSOG version or streamlined LSR for LNP:
  - The LSOG and LSR are not exclusively reserved for LNP.
  - The use of common LSOG does not eliminate the need for service providers (SPs) to customize their internal processes.
  - BellSouth dedicates significant resources to upgrading its systems to comply with LSOG standards.
  - BellSouth maintains two versions of LSOG ordering map in its systems at any point in time; carriers are required to comply with the most recent or prior version in use.
- The NANC report recognized that there is current industry work on intermodal porting issues, including the elimination of validation fields on an LSR. Examples of issues that were or are still under consideration are:
  - Issue 2801 - Fields Causing Significant Fall-Out On Intermodal Ports (*Initial Closure*)
  - Issue 2943 - Minimal Data Exchange Number Portability Service Request (*Open*)
  - Issue 2802 - LSR Field Data That Wireless Processes Don't Collect (*Final Closure*)
  - Issue 2813 - Enhancement to the Local Service Migration Guidelines -Phase 2 (*Final Closure*)
  - Issue 2753 - Creation of Data Mapping and Fax Form For Wireless to Wireline Porting (*Open*)



## Using Existing Porting Processes & Procedures

- Many problems experienced by wireless providers in completing LSRs stem from failure to follow established carrier porting processes and guidelines.
- BellSouth data shows that as more wireless providers and third party vendors have used established carrier processes, the number of ports in error and inadvertent ports has declined.
- The use of pre-ordering & pre-port processes would eliminate many LSR errors by:
  - Allowing service providers to access accurate customer record information, including listing name, billing address, street address etc.
  - Eliminating confusion over the appropriate name (e.g. John Smith or J. Smith, etc.) or whether to use abbreviations (e.g. Street vs. St. or Ave. vs. Avenue, etc.)



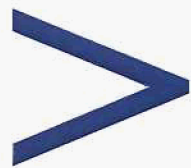


## Unwarranted Claims About Intermodal Porting

- Carriers are “constantly changing business rules to port a number” & “each carrier uses a different LSR”
  - BellSouth issues carrier notification letters, whether they apply to WLNP or other wholesale product ordering changes.
  - Since implementation of WLNP, BellSouth has issued six carrier notifications letters that were specific to WLNP and only two addressed the actual porting process.
- “Business rules vary significantly between carriers”
  - CLECs also complained about different business rules when LNP was originally implemented. All LECs use different systems to handle LSR processing and this may result in varying business rules.
  - The wireless community is creating a new fax form for porting their numbers away to a LEC. The LECs will have to adhere to their business rules or the port cannot take place. It is to be expected that business processes differ among companies.
- Carriers are “applying edits on an excessive number of fields” & “carriers identify only one error at a time”
  - BellSouth has looked at the possibility of relaxing some of the WLNP field edits that the wireless community has discussed at OBF. In particular, the address field input has been discussed.
  - OBF is investigating requests by WSPs to reduce fields.
  - BellSouth returns all identifiable errors at one time.

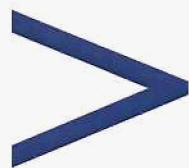
# Unwarranted Claims About Intermodal Porting

- “Requiring cancellation of any other services associated with the line before the number can be ported.”
  - BellSouth does not require cancellation of services associated with a line before the number can be ported unless an end user has requested a local service freeze (LSF) on his/her account, or a prior port is pending.
- “Specifically, ILECs will not honor porting requests if a customer has not first cancelled their tied DSL service.”
  - If a BellSouth end user requesting to port has DSL service, the LSR will be clarified.
  - The CLEC community requested, and agreed to, this clarification being sent. If the provider wishes to proceed with the port, they send a supplemental LSR and the port will continue processing.
- “Limiting the number of port requests that can be submitted.”
  - BellSouth does not have any business rules that limit the number of port requests that a WSP can submit.



## **VoIP Service Providers & Access to Numbers**

- On August 3, 2005, NANC submitted to the FCC its report on VoIP service providers obtaining numbers directly from the North American Numbering Plan Administrator (NANPA) and the Pooling Administrator (PA).
- NANC recommended that North American Number Plan (NANP) telephone numbers be available to all service providers including VoIP service providers.
- Included in the NANC report is the recommendation that VoIP service providers that obtain numbers directly from the administrators participate in Local Number Portability (LNP) and adhere to FCC porting requirements.
- However, the NANC report acknowledges that a detailed analysis of the impacts of Local Number Portability (LNP) and VoIP service providers has not been completed.



## VoIP Service Providers & Access to Numbers

- BellSouth supports the recommendations in the NANC report on VoIP service providers obtaining numbering resources directly from NANPA and the PA including the requirement that VoIP service providers be able to participate in porting.
- However, if VoIP service providers are not familiar with existing LNP processes, BellSouth is concerned that as VoIP service providers begin to directly port, BellSouth will be faced with unnecessary LNP issues similar to those it experienced when wireless LNP was implemented.
- If the Commission allows VoIP service providers to obtain numbers directly from NANPA and the PA, the Commission needs to affirm that:
  - VoIP service providers comply with existing LNP processes and intervals;
  - VoIP service providers do proper testing in preparation for LNP;
  - VoIP service providers are encouraged to use available pre-ordering & pre-port processes.
- In addition, FCC should encourage VoIP service providers to actively participate in NANC LNPA Working Group meetings.
- FCC should encourage VoIP service providers to abide by and comply with the Local Service Migration Guidelines (LSMG) published by ATIS OBF.

## Summary

- No evidence exists that there is a need to shorten the current four-day interval for intermodal porting.
- However, if the Commission decides to reduce the porting interval, it should adopt the NANC recommendation, which applies only to simple, mechanized error-free intermodal ports.
  - Commission must also allow reasonable time for implementation and allow cost recovery.
- Commission should decline the use of a common LSOG version and let the industry address this issue.
- Commission should require the use of existing pre-ordering & pre-port processes, where available.
- VoIP service providers that obtain numbers directly from the NANPA and the PA should adhere to existing numbering rules & processes including industry processes on porting.